

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**SPJST LODGE #154 & AMERICAN  
SOKOL ORGANIZATION,**

**Plaintiffs,**

**V.**

**CENTURY SURETY COMPANY,**

**Defendant.**



**CIVIL ACTION NO. 4:15-cv-710-O**

## JURY DEMAND

**JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES**  
**AND CONTINUE TRIAL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiffs, SPJST Lodge #154 & American Sokol Organization, and Defendant, Century Surety Company, and file this Joint Motion to Extend the Scheduling Order Deadlines and Continue Trial, and shows the court the following:

## A. INTRODUCTION

1. On July 7, 2016, the Court entered a Scheduling Order [Dkt. 23].
2. On December 27, 2016, Defendant, Century Surety Company filed its Motion for Summary Judgment [Dkt. 24] and Brief in Support [Dkt. 25]. The parties have since filed their Response [Dkt. 34] and Reply Briefs [Dkt. 38].
3. The parties now seek an extension of time as to all remaining deadlines of the Court's Scheduling Order. The parties also seek a continuance of this case pending the Court's determination of Century's Motion for Summary Judgment.

**B. ARGUMENT**

4. A court can modify a scheduling order on a showing of good cause. Fed. R. Civ. P. 16(b)(4); *Inge v. Rock Fin. Corp.*, 281 F.3d 613, 625 (6th Cir. 2002).

5. There is good cause to modify the current scheduling order pending the Court's ruling on Century's Motion for Summary Judgment.

**C. CONCLUSION**

For the stated reasons, Plaintiffs and Defendant ask the Court to modify the Scheduling Order and Continue Trial until after a ruling on Century's Motion for Summary Judgment.

Respectfully submitted,

By: s/ R. Brent Cooper

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2017 I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, using the electronic filing system of the court. The electronic case files system sent a "Notice of Electronic Filing" to the following individuals who have consented in writing to accept this Notice as service of this document by electronic means:

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